

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 08 CR 6
v.	)	
	)	Judge Wayne R. Andersen
GERARDO RODRIGUEZ	)	

**UNOPPOSED MOTION TO TRANSFER MR. RODRIGUEZ**  
**TO THE MCC ONE WEEK PRIOR TO TRIAL**

Defendant GERARDO RODRIGUEZ, by the Federal Defender Program and its attorney, DANIEL HESLER, respectfully requests that the Court to issue an order that Mr. Rodriguez be transferred back to the MCC Chicago no later than March 31, 2008, in order to assist counsel in preparing for trial.

Mr. Rodriguez's trial is currently set to begin on April 7, 2008. Mr. Rodriguez is currently being held at the Old Kankakee Jail facility at 400 E. Merchant St. in Kankakee, IL. Because of the travel time involved from Chicago to Kankakee, face to face communication with Mr. Rodriguez is difficult. Counsel expects that frequent communication with Mr. Rodriguez will be critical to trial preparation in the week leading up to trial. Mr. Rodriguez requests that he be ordered back to the MCC Chicago no later than March 31, 2008.

Assistant United States Attorney Cliff Histed has been contacted concerning this motion and has no objection to an order that Mr. Rodriguez be transferred to the MCC.

Respectfully submitted,  
FEDERAL DEFENDER PROGRAM  
Terence F. MacCarthy  
Executive Director

By: s/ Daniel J. Hesler  
Daniel J. Hesler

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**CERTIFICATE OF SERVICE**

The undersigned, Daniel J. Hesler, an attorney with the Federal Defender Program hereby certifies that in accordance with FED.R.CRIM. P. 49, FED. R. CIV. P5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document(s):

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was served pursuant to the district court's ECF system as to ECF filings, if any, and were sent by first-class mail/hand delivery on March 24, 2008, to counsel/parties that are non-ECF filers.

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